

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
_____	:	

DEFENDANT’S PROPOSED VIOR DIRE QUESTIONS

Defendant Universal Protection Service LP d/b/a Allied Universal Security Services (“Allied” or “Defendant”) Defendant in the above-styled and numbered cause of action, and request that, in addition to the Court’s customary and intended instructions and voir dire questions, the following inquiries be made to potential jurors in this case.

A. AREAS OF INQUIRY

I. PARTIES AND WITNESSES

1. Does anyone know the Plaintiff Twana Ahmed who brought this case?
2. Does anyone have any personal knowledge of the facts or background of this lawsuit?
3. Does anyone know or heard of any of the lawyers representing Allied in this case?
 - a. Gary Kessler
 - b. Nathan Shine
 - c. Jessica Chang
4. Has anyone had any dealings with, heard of, or familiar with the law firm Martenson, Hasbrouck and Simon?
5. Does anyone know or heard of any of the lawyers representing Plaintiff in this case?
 - a. Amy Gibson
 - b. David Wiley

- c. Amanda Hernandez
- 6. Does anyone know or have any of you been otherwise acquainted with any of the following people who may appear as witnesses in this case in addition to the parties?
 - a. [All witnesses determined by the parties for trial.]
- 7. Has anyone ever been an employee or shareholder of Allied or any of its related entities or affiliates?
- 8. Do any of you have a family member or know anyone who has worked for Allied or any of its related entities or affiliates?
- 9. Has anyone ever worked as a security guard?
- 10. Has anyone ever worked for a contractor or business partner of Allied?
- 11. Have any of you, a member of your family, or a close friend ever had any bad experiences with Allied?

II. WORKPLACE EXPERIENCES

- 1. Have you ever experienced discrimination at work? Was it in regard to your race? Was it in regard to your national origin? Was it in regard to your religion?
- 2. How did you handle that situation? Was the conduct reported to the company? Was it resolved to your satisfaction?
- 3. Have any of you ever been fired from a job? If so, do you believe you were fired because of your race, national origin, religion or some other protected classification?
- 4. Have any of you ever been demoted, put on probation, or terminated for deficiencies or problems in your work performance? If so, do you believe your employer's decision was based on your race, national origin, religion or some other protected classification?
- 5. Have any of you had any experience or involvement with a complaint of discrimination at your job?
- 6. Have any of you had any experience or involvement with a complaint of discrimination outside the context of employment?
- 7. Have any of you, a member of your family, or a close friend ever been accused of discriminating against or harassing someone?
- 8. Any experiences with discrimination in the workplace which would prevent you from being a fair juror?
- 9. Are any of you owners of your own business, self-employed, or has been self-employed?

III. PRIOR LITIGATION

1. Have any of you ever been a party to a lawsuit before?
2. Have any of you served as a juror in a civil or criminal case in the past?
3. Have any of you, a member of your family, or a close friend ever served as a juror or witness in the trial of a lawsuit relating to an employment dispute or an allegation of employment discrimination?
4. Have any of you, a member of your family, or a close friend ever filed any sort of claim of wrongful conduct against an employer or former employer?
5. Have any of you, a member of your family, or a close friend ever filed a lawsuit against an employer or former employer?
6. Have any of you, a member of your family, or a close friend ever filed employment-related charges, complaints, or grievances with any federal, state, or city agencies or authorities?
7. Have any of you, a member of your family, or a close friend ever filed a discrimination charge or complaint against an employer with a state or federal agency, such as the Equal Employment Opportunity Commission (“EEOC”), the Texas Workforce Commission (“TWC”), or the U.S. Department of Labor?
8. Have any of you, a member of your family, or a close friend ever worked for the EEOC, TWC, or Department of Labor?
9. Have you, a family member or close friend ever worked in the legal field?
10. Have you or anyone close to you ever been employed in the personnel field or human resources?

IV. CORPORATION AS PARTY/ALLIED

1. Allied is a company, a corporation. Do any of you have negative feelings about corporations or believe that corporations should always be found responsible in a lawsuit?
2. Does anyone believe from prior experiences or jobs that an employee’s version of events is more credible or worthy of belief than the employer’s? If there are differences between an employee’s and company’s version, does anyone believe that the employee’s version is always more trustworthy?
3. Would anyone have difficulty giving a corporate entity the same consideration and fairness that you would give a person for the purposes of determining the issues presented in this lawsuit?

4. Have any of you, a member of your family, or a close friend ever had any bad experiences with Allied or an employee of Allied?
 - a. Has that experience given you a bias against Allied?
 - b. Will you hold that experience against Allied as you listen to the evidence in this case?
 - c. Will that experience prevent you from objectively listening to the facts and following the law in this case as the Judge will give to you later?
5. Would anyone have difficulty affording Allied a fair trial because of anything you heard or read about Allied?

V. MILITARY EXPERIENCE

1. Have you or a close family member served in the United States military? If so, could you briefly describe your or your family member's branch of service and role?
2. Did any part of your military experience involve making or following rules related to discipline, investigations, or workplace conduct?
3. Have you had any experiences in the military that would impact your ability to fairly consider the facts which may be presented in this matter?

VI. NEWS SOURCES AND SOCIAL NETWORKING

1. Are there particular sources that you find to be credible when obtaining your news or current events?
2. Are there specific news sources, such as websites, newspapers, or podcasts, that you read or follow regularly.
3. Are there television or cable stations that you watch on a regular basis?
4. Are you active on social networking sites? If so, which ones?
5. Are social networking sites a source of news and current events for you?

VII. BURDEN OF PROOF

1. Our judicial system provides it is up to the Plaintiff to prove his allegations by a preponderance of the credible evidence. It is not up to Allied to disprove Plaintiff's allegations. If Plaintiff fails to convince you by a preponderance of the evidence that his allegations in this lawsuit are true, would any of you have difficulty returning a verdict for Allied?
2. Are there any of you who believe that if you were selected to serve on this jury, it would be difficult for you to decide the questions submitted to you solely on the basis of the

evidence presented during the trial because of some feeling of sympathy you may have for one of the parties or some bias or prejudice you may feel against one of the parties?

VIII. DAMAGES

1. In this case, the Plaintiff must also prove that he has been damaged by Allied, and he must prove his damages by a preponderance of the evidence. Do any of you feel that just because someone files a lawsuit, they are entitled to win and get money?
2. Would all of you be able to find that the Plaintiff should receive no money from Allied if Plaintiff cannot prove his case according to the instructions that the Court will give you after all of the evidence comes in?
3. Do any of you feel that a company should be punished by being made to pay lots of money if they have been sued?

B. CONCLUSION

Defendants respectfully request the Court include these inquiries in its examination of the jury panel or allow Defendants to conduct limited voir dire at trial in this case.

Date: May 2, 2025

MARTENSON, HASBROUCK & SIMON LLP

/s/ Jessica E. Chang

Jessica E. Chang, Attorney-In-Charge
(SDTX No. 3905098, IL6319080)

Nathan A. Shine (SDTX No. 3874604, IL6316753)

Martenson, Hasbrouck & Simon LLP

500 Davis Street, Suite 1010

Evanston, Illinois 60201

(224) 350-3127

jchang@martensonlaw.com

nshine@martensonlaw.com

Gary R. Kessler (*SDTX Admission To Be Filed*)

Martenson, Hasbrouck & Simon LLP

2573 Apple Valley Road NE

Atlanta, Georgia 30319

(404) 909-8100

gkessler@martensonlaw.com

*Counsels for Defendant Universal Protection
Service, LP d/b/a Allied Universal Security Services*

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system that will serve notice and a copy on all counsel of record as follows:

Amanda C. Hernandez
AH Law, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057
amanda@ahfirm.com

Amy Gibson
David Wiley
Gibson Wiley PLLC
1500 Jackson Street, #109
Dallas, Texas 75201
amy@gwfirm.com
david@gwfirm.com

/s/ Jessica E. Chang
Jessica E. Chang